

1 HEATHER E. WILLIAMS, #122664
Federal Defender
2 MEGAN T. HOPKINS, #294141
Assistant Federal Defender
3 801 I Street, 3rd Floor
Sacramento, CA 95814
4 Telephone: 916-498-5700
Fax: 916-498-5710 **Error! Bookmark not defined.**

5
6 Attorneys for Defendant
BRYAN PAUL TAMBLYN

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 BRYAN PAUL TAMBLYN,

15 Defendants.

Case No. 2:20-cr-00014-DJC

STIPULATION AND ORDER TO CONTINUE
CHANGE OF PLEA HEARING

DATE: August 10, 2023

TIME: 9:00 a.m.

JUDGE: Hon. Daniel J. Calabretta

16
17 IT IS HEREBY STIPULATED by and between the parties hereto through their
18 respective counsel, that the Change of Plea hearing scheduled for June 1, 2023, at 9:00 a.m. be
19 continued to **August 10, 2023, at 9:00 a.m.**

20 The defense requests additional time to review discovery and conduct further research
21 regarding the sentencing guidelines. The parties and case agent have arranged for a secondary
22 review of contraband materials at the FBI office in the coming weeks, and the defense is working
23 diligently to wrap up outstanding legal research relevant to plea negotiations. Defense counsel
24 previously believed that a continuance to June 1, 2023, would allow sufficient time to conclude
25 the outstanding tasks, however due to a medical condition counsel was unforeseeably delayed.
26 Defense counsel anticipates that a continuance to August 10, 2023, will provide sufficient time to
27 complete outstanding investigation and research such that a change of plea can proceed on that
28

1 date.

2 The parties agree that the ends of justice served by continuing the change of plea hearing
3 date outweigh the best interest of the public and the defendant in a speedy trial. Therefore, the
4 parties agree that time is excludable up to and including August 10, 2023, pursuant to 18 U.S.C.
5 § 3161(h)(7)(A), (B)(iv) (Local Code T4).

6
7 Respectfully submitted,

8 HEATHER E. WILLIAMS
9 Federal Defender

10 DATED: May 24, 2023

/s/ Megan T. Hopkins
MEGAN T. HOPKINS
Assistant Federal Defender
Attorneys for Defendant
BRYAN PAUL TAMBLYN

14 PHILLIP A. TALBERT
15 United States Attorney

16 DATED: May 24, 2023

/s/ Christina McCall
CHRISTINA MCCALL
Assistant United States Attorney
Attorney for Plaintiff

ORDER

IT IS SO ORDERED that the change of plea hearing currently scheduled for June 1, 2023, at 9:00 a.m. is hereby continued to **August 10, 2023, at 9:00 a.m.** The time period between June 1, 2023, and August 10, 2023, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: May 24, 2023

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE